

EXHIBIT B


Jennifer Dodge <jdodgelaw@jenniferdodgelaw.com>

PG&E - Greenberg

12 messages

Richard Lapping <rich@trodelalapping.com>
To: Jennifer Dodge <jdodgelaw@jenniferdodgelaw.com>

Wed, May 18, 2022 at 2:04 PM

Jennifer,

I understand from our conversation yesterday after David Brown's deposition that since PG&E cannot produce a witness for one of the areas specified in the PMQ deposition this week, that you will produce a witness sometime next week at a date and time to be agreed upon, notwithstanding that the discovery cutoff is May 20, 2022. Please confirm.

Rich Lapping

**TRODELLA & LAPPING LLP**540 Pacific Ave • San Francisco, CA 94133
Direct: 415.399.1015 • Mobile: 415.200.9407 • rich@trodelalapping.comwww.trodelalapping.com

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Jennifer Dodge <jdodgelaw@jenniferdodgelaw.com>
To: Richard Lapping <rich@trodelalapping.com>
Bcc: Jennifer Dodge <jdodgelaw@gmail.com>

Wed, May 18, 2022 at 5:03 PM

Rich,

Confirmed.

Since we are agreeing to conduct discovery beyond the discovery cut-off, I think that it might be a good idea to request a continuance of the Pre-Trial Status Conference scheduled for May 24 until the week of May 30 because all discovery will be complete at that time. Please let me know your availability that week. There is an omnibus hearing scheduled for June 7 if the week of May 30 does not work for you or if the Court is not available.

Jennifer

[Quoted text hidden]

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Law Offices of Jennifer L. Dodge Inc.

2512 Artesia Blvd., Suite 300D

Redondo Beach, CA 90278

T: 310.372.3344

F: 310.861.8044

C: 310.890.7922

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Richard Lapping <rich@trodelalapping.com>
To: Jennifer Dodge <jdodgelaw@jenniferdodgelaw.com>

Wed, May 18, 2022 at 5:08 PM

Thanks. I assume you meant May 31, which is the Tuesday after Memorial Day. I could do that or June 7.

Rich Lapping

[Quoted text hidden]

Jennifer Dodge <jdodgelaw@jenniferdodgelaw.com>
To: Richard Lapping <rich@trodelalapping.com>
Cc: Thomas Rupp <trupp@kbkllp.com>
Bcc: Jennifer Dodge <jdodgelaw@gmail.com>

Wed, May 18, 2022 at 5:12 PM

Yes, correct. May 31 is a Tuesday; I don't know if the Court is available that day. If it is not, we could do June 7. Tom is going to send an email to the Court requesting the continuance to one of those dates.

Jennifer

[Quoted text hidden]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]